

) No. 5:12-cv-01341-G

CLASS ACTION

This Document Relates To:

NOTICE OF NON-PARTY SUBPOENAS

ALL ACTIONS.

—)

PLEASE TAKE NOTICE that pursuant to LCvR 45.1(a) and Rules 26, 30 and 45 of the Federal Rules of Civil Procedure, Lead Plaintiffs Laborers Pension Trust Fund for Northern Nevada, Construction Laborers Pension Trust of Greater St. Louis, and Vladimir Galkin and Angelica Galkin (collectively, “Plaintiffs”), by their counsel, will serve the subpoenas attached as Exhibits 1 – 3, commanding the production of documents, electronically-stored information and depositions of the following non-parties, as described in the Subpoenas to Testify at a Deposition in a Civil Action, on the dates, times and locations listed below, or on some other date, time or location agreed to by the parties:

NON-PARTY	DATE/TIME	LOCATION
Larry McFarlin 3710 Joshua Lane Oklahoma City, OK 73165-5001	12/06/2018 at 10:00 AM	Derryberry & Naifeh, LLP 4800 North Lincoln Blvd. Oklahoma City, OK 73105
Paul Stark 3116 Beacon Hill Street Edmond, OK 73034-8338	12/10/2018 at 10:00AM	Derryberry & Naifeh, LLP 4800 North Lincoln Blvd. Oklahoma City, OK 73105
Rodney Johnson 5701 Wynstone Drive Edmond, OK 73034-9126	12/14/2018 at 10:00AM	Derryberry & Naifeh, LLP 4800 North Lincoln Blvd. Oklahoma City, OK 73105

PLEASE TAKE FURTHER NOTICE that the depositions will be taken before a person authorized by law to administer oaths under Rule 28(a) of the Federal Rules of Civil Procedure and shall continue day-to-day, excluding Sundays and holidays, until completed. The depositions may be transcribed in LiveNote, accessible to counsel who have appropriate computer equipment, and will be videotaped by a professional videographer. The

depositions will be taken for the purposes of discovery for use in the present suit and for any other purpose permitted by the Federal Rules of Civil Procedure.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 45(g) of the Federal Rules of Civil Procedure, the Non-Parties may be held in contempt of Court if they fail, without adequate excuse, to obey the subpoenas served upon them, and that the Non-Parties have certain legal rights in response to the subpoenas served upon them as outlined in Rule 45(c)-(d) of the Federal Rules of Civil Procedure.

DATED: November 2, 2018

ROBBINS GELLER RUDMAN
& DOWD LLP

SAMUEL H. RUDMAN (admitted *pro hac vice*)
EVAN J. KAUFMAN (admitted *pro hac vice*)
CHRISTOPHER T. GILROY (admitted *pro hac vice*)

/s/ Evan J. Kaufman

EVAN J. KAUFMAN

58 South Service Road, Suite 200
Melville, NY 11747
Telephone: 631/367-7100
631/367-1173 (fax)
srudman@rgrdlaw.com
ekaufman@rgrdlaw.com
cgilroy@rgrdlaw.com

Lead Counsel for Plaintiffs

DERRYBERRY & NAIFEH, LLP
DARREN B. DERRYBERRY
(OBA No. 14542)
4800 North Lincoln Blvd.
Oklahoma City, OK 73105
Telephone: 405/708-6784
405/528-6462 (fax)
dderryberry@derryberrylaw.com

Liaison Counsel

HAEGGQUIST & ECK, LLP
AMBER L. ECK
225 Broadway, Suite 2050
San Diego, CA 92101
Telephone: 619/342-8000
619/342-7878 (fax)
ambere@haelaw.com

Additional Plaintiffs' Counsel

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system for filing. Based on the records on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the ECF registrants of record.

I certify under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 2, 2018.

/s/ Evan J. Kaufman

Evan J. Kaufman